

ATTACHMENT E

PRE-OPERATIONAL WELL TESTING PLAN

1. FACILITY INFORMATION

Facility name: River Parish Sequestration – RPN 3

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Well name/location: RPN-3-INJ, Assumption Parish, Louisiana

2. INTRODUCTION

The RPN-3-INJ will be a newly drilled well, constructed to Environmental Protection Agency (EPA) Class VI standards. The testing activities at the RPN-3-INJ facility described in this attachment satisfy the requirements of 40 CFR 146.87 and are restricted to the pre-injection phase. River Parish Sequestration, LLC (RPS) will provide a descriptive report prepared by a knowledgeable log analyst that includes an interpretation of the results of the tests and logs described herein, as required by 40 CFR 146.87(a). Testing and monitoring activities during the injection and post-injection phases are described in the Testing and Monitoring Plan (**Attachment F**), [REDACTED]

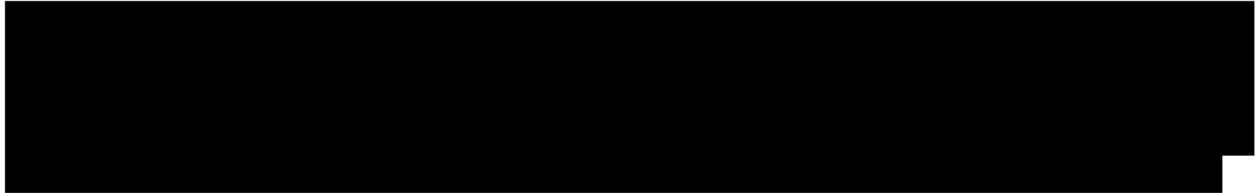
3. PRE-INJECTION TESTING PLAN – INJECTION WELL

The following tests and logs will be conducted during drilling and casing installation, as well as after casing installation in accordance with the testing required under 40 Code of Federal Regulations (CFR) 146.87(a), (b), (c), and (d). [REDACTED]

3.1. Deviation Checks



3.2. Coring



3.3. Tests and Logs

Tests and logs to be performed during drilling of the injection well are given in **Table 3.3-1**, including each test's target data objectives. Tests and logs to be performed during and after casing installation in the injection well are given in **Table 3.3-2**, including each test's target data objectives.

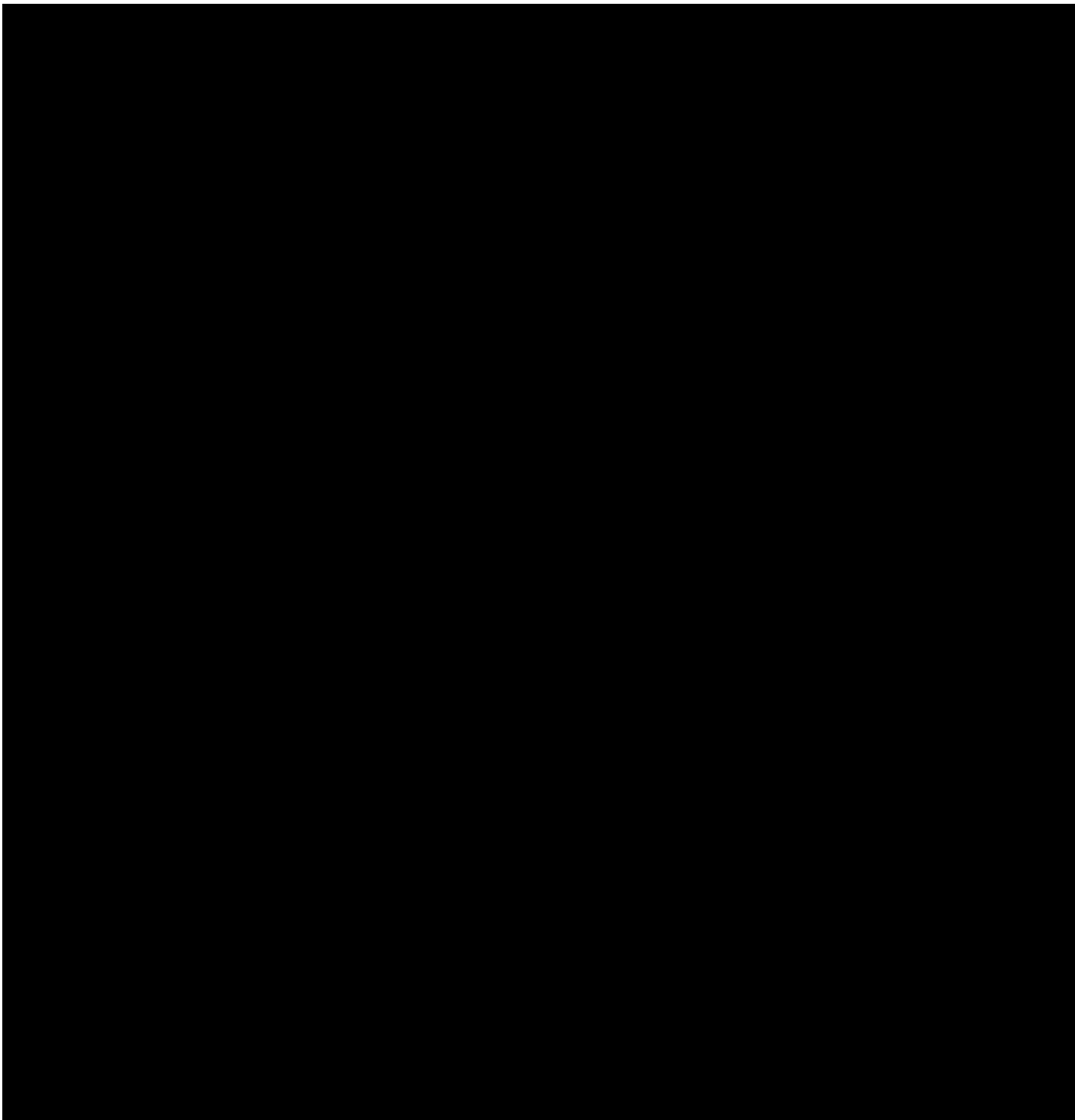
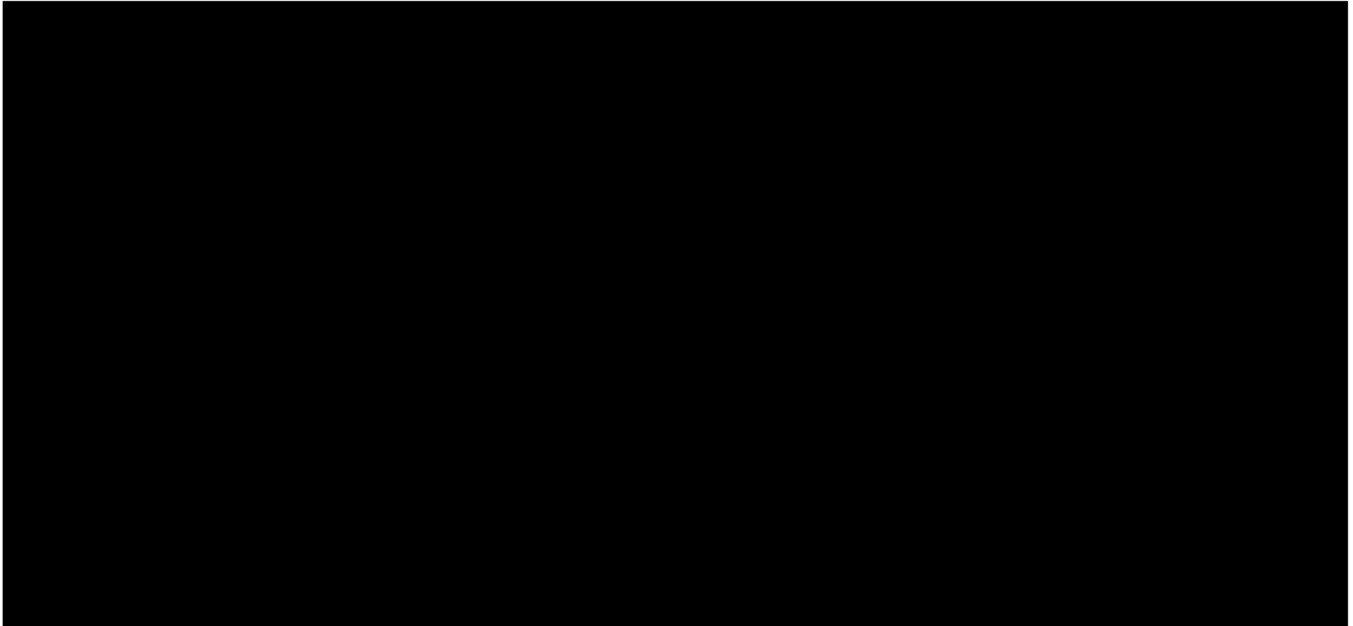
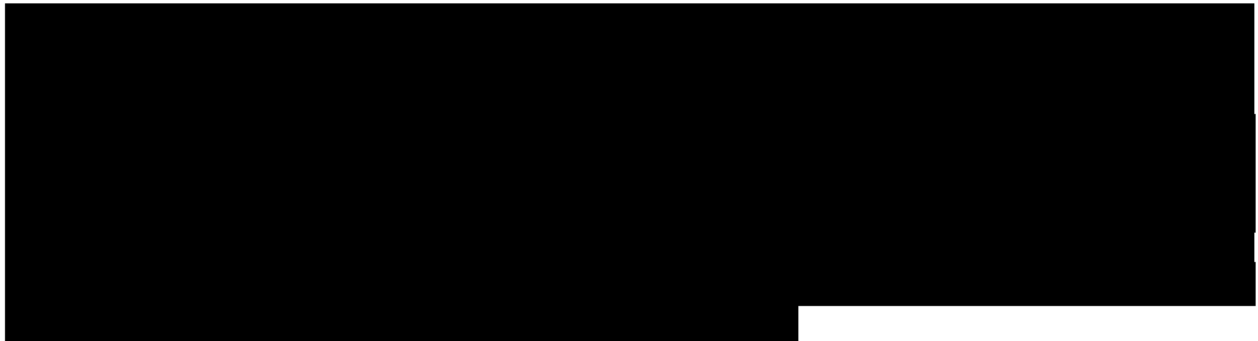


Table 3.3-2: Injection Well Cased Hole Logging Plan

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3.3.1. Open Hole Formation Fluid and Mini Fracture Testing

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3.4. Demonstration of Mechanical Integrity

Table 3.4-1 provides a summary of the mechanical integrity tests (MITs) and other tests to be performed prior to injection.

Table 3.4-1: Pre-Operational Testing Schedule

Class VI Rule Citation
40 CFR 146.89(a)(1)
40 CFR 146.87(a)(4)
40 CFR 146.87(a)(4)
40 CFR 146.87(a)(4)
40 CFR 146.87(e)(1)
40 CFR 146.87(e)(3)

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3.4.1. Internal Mechanical Integrity Testing – Annulus Pressure Test

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Annulus Pressure Test Procedures for Injection Well:

1. RPS will comply with all reporting and notification provisions.
 - a. EPA Underground Injection Control (UIC) Program Director and Louisiana Department of Natural Resources (LDNR) Office of Conservation Commissioner will be notified 30 days in advance of planned testing efforts per 40 CFR 146.87(f).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3.4.2. External Mechanical Integrity Testing

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3.4.3. Pressure Falloff Testing

[REDACTED]

Testing Method

[REDACTED]

[REDACTED]

3.4.4. Initial Step Rate Injectivity Test

[REDACTED]

[REDACTED]

[REDACTED]

Initial Step Rate Injectivity and Pressure Fall-Off Test Procedures:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]

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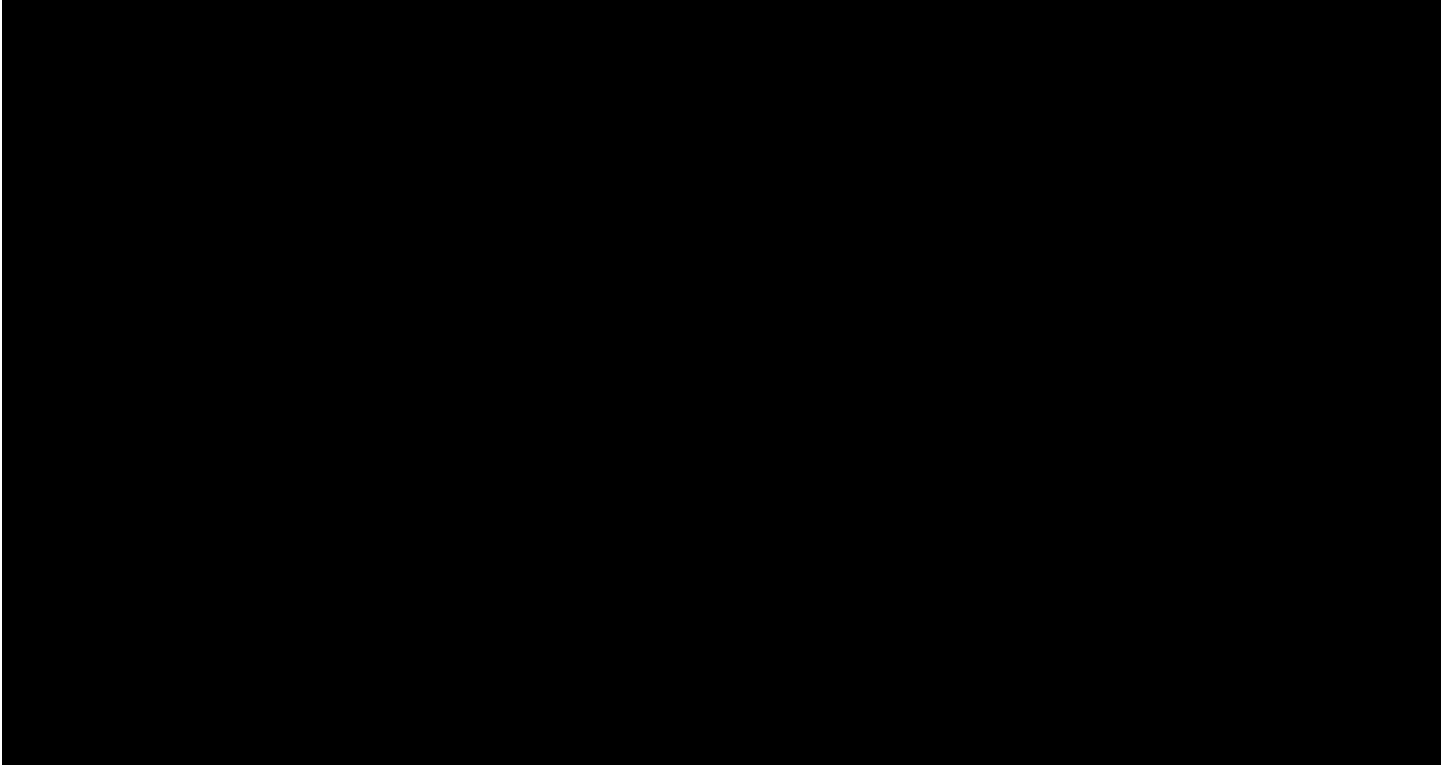
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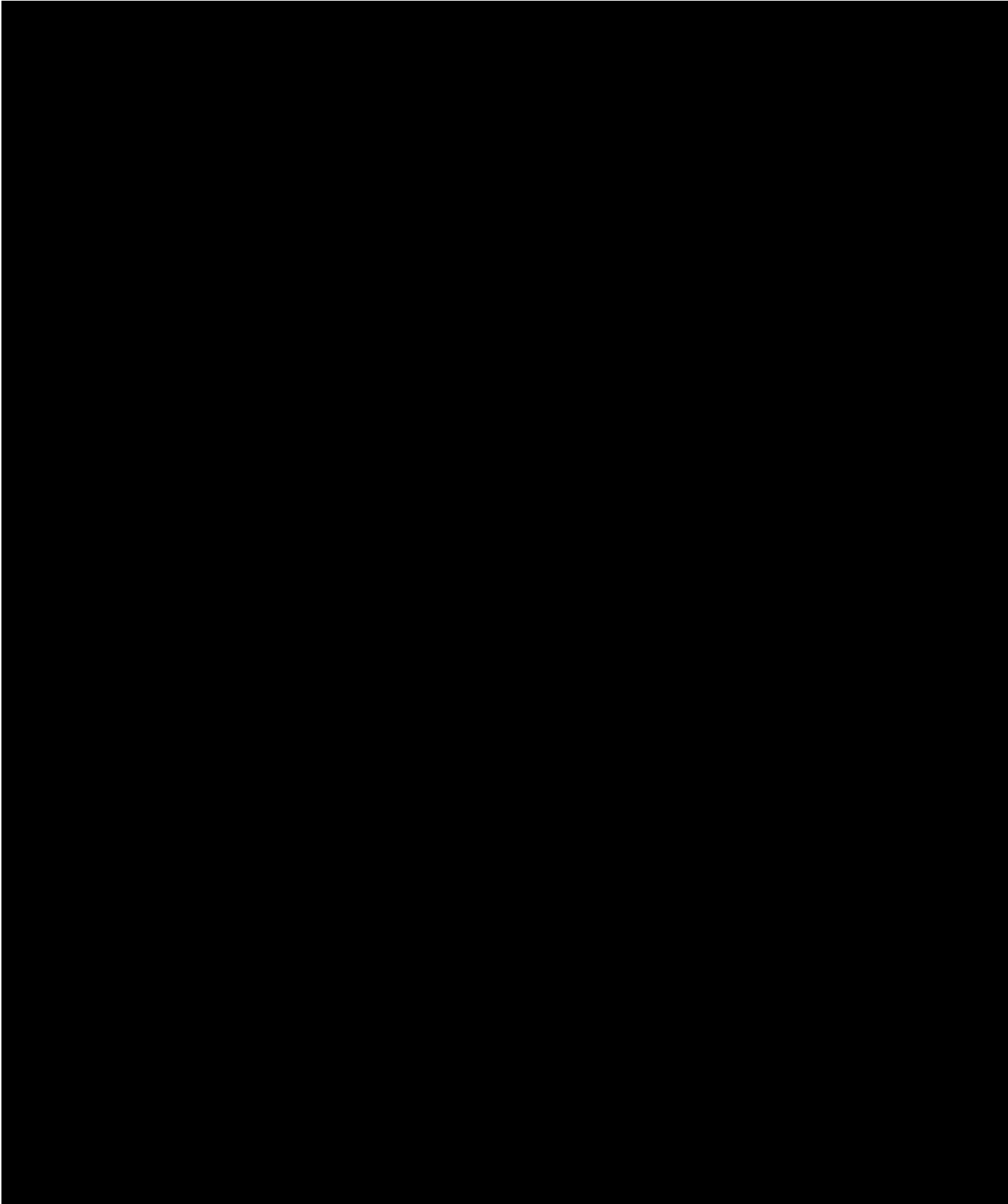
[REDACTED]

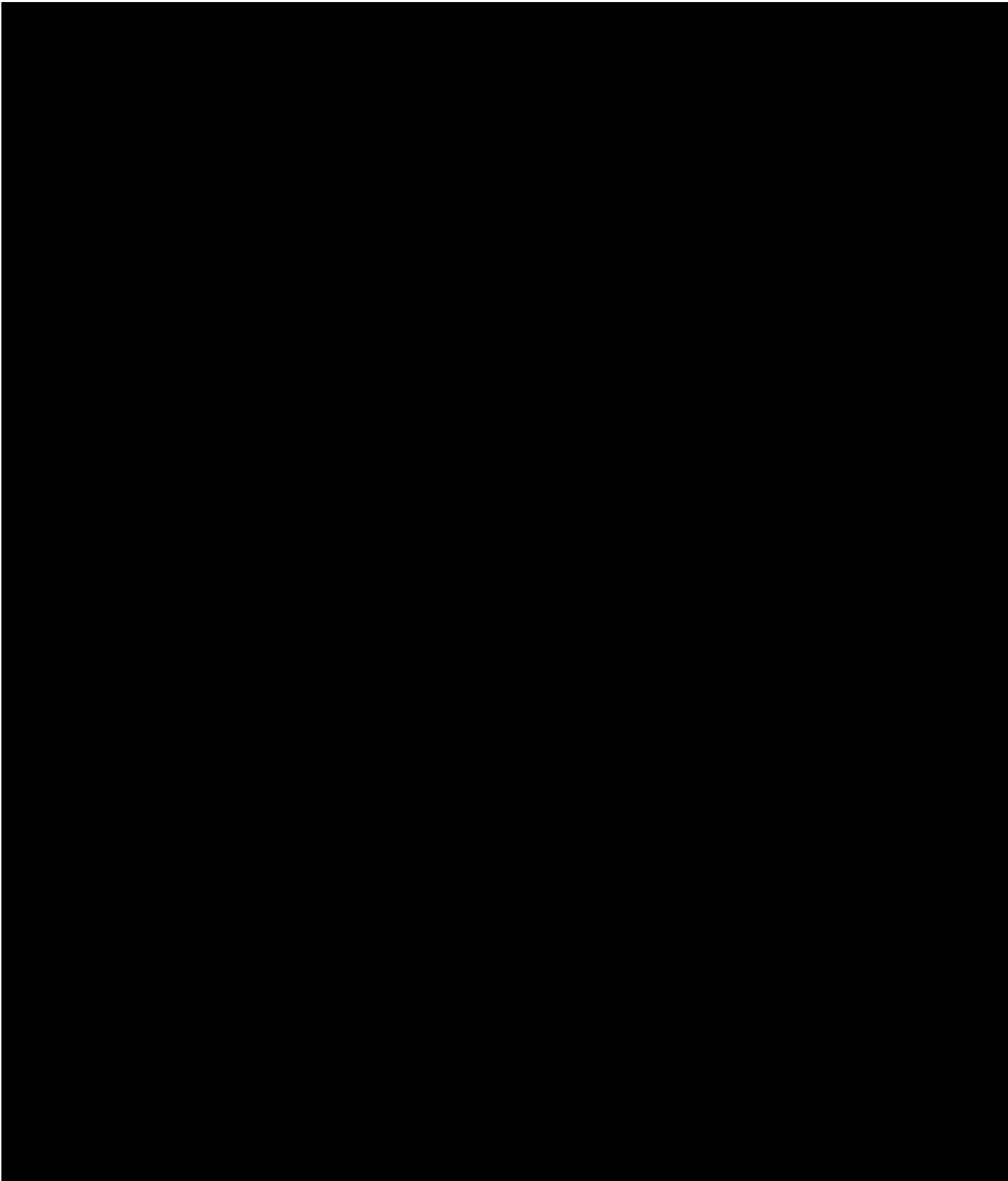
4. PRE-INJECTION TESTING PLAN – MONITORING WELLS

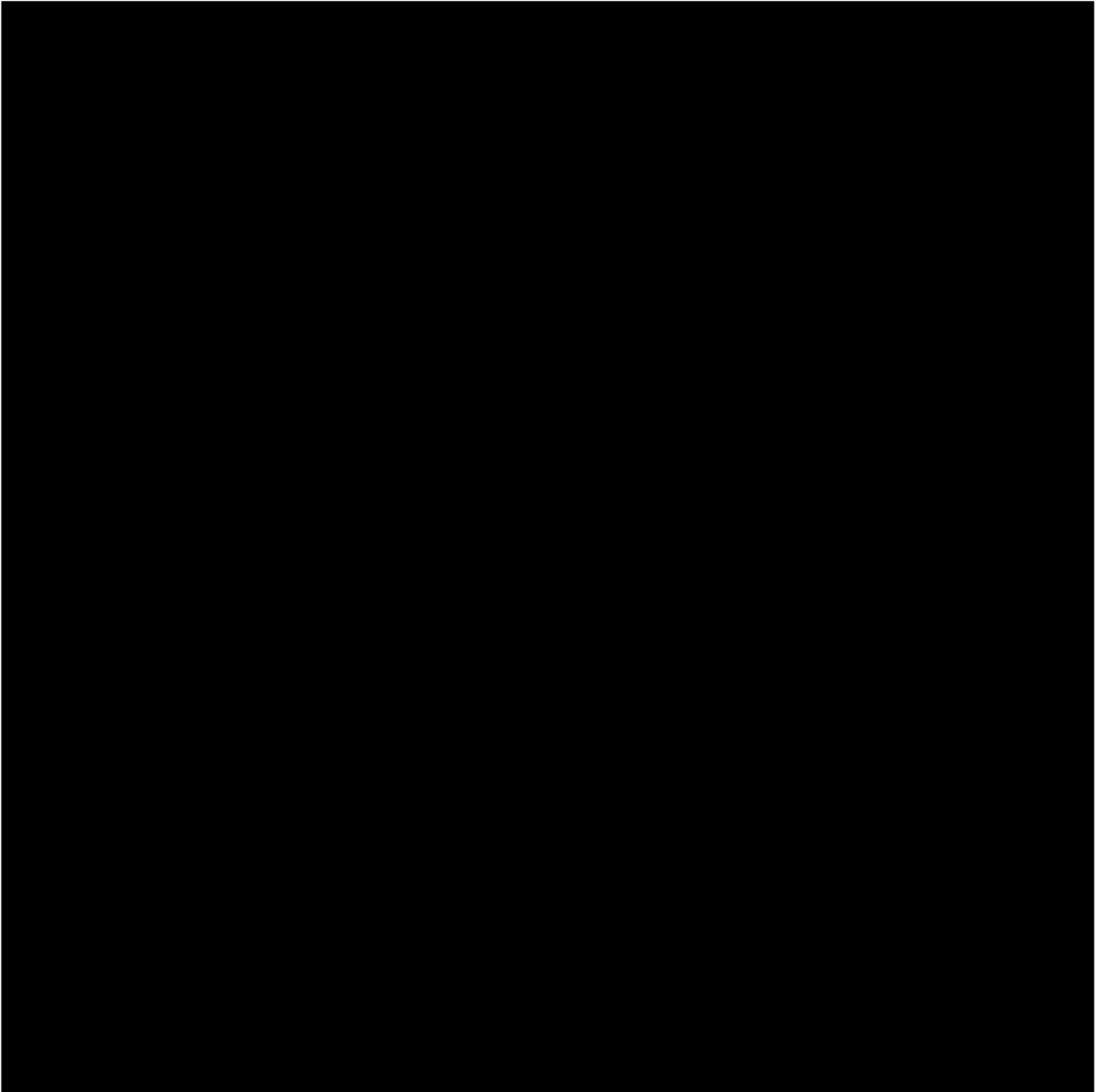
Monitoring wells will be evaluated during the pre-injection period. The following testing and logging plans apply to all wells listed in **Table 4-1**.

Pre-Operational Testing Plan for River Parish Sequestration – RPN 3
Permit Number: TBD

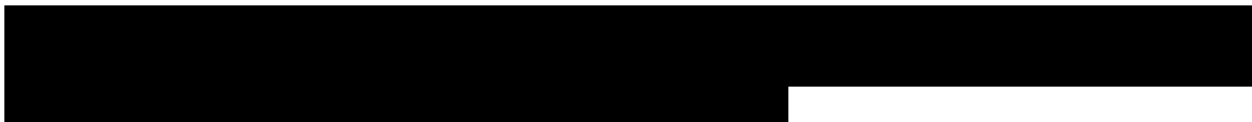


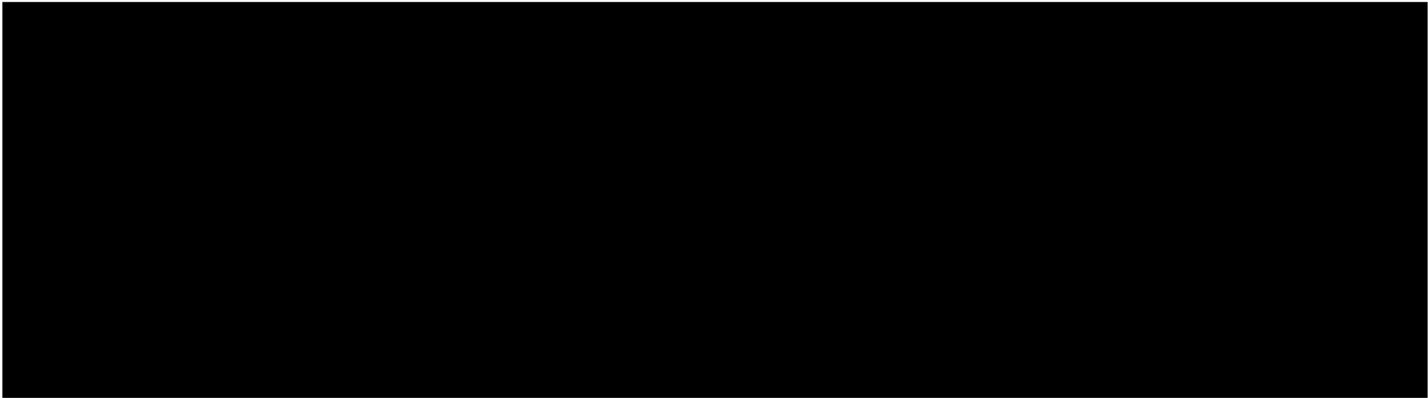






4.4. Demonstration of Mechanical Integrity





4.4.1. Internal Mechanical Integrity Testing



[redacted] of 60 minutes using a pressure gauge with sensitivities that can indicate a loss of 5%.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4.4.2. External Mechanical Integrity Testing for Monitoring Wells

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

5. WITNESSING OF PRE-OPERATIONAL WELL TESTING

In compliance with 40 CFR 146.87(f), RPS will submit a schedule of the proposed tests and logs at least 30 days before conducting the first test to allow the UIC Program Director and the Office of Conservation Commissioner the opportunity to witness these tests. Changes to the testing schedule will be submitted at least 30 days prior to the next scheduled test.